

R. BLAKE HAMILTON (Bar No. 11395)
ASHLEY M. GREGSON (Bar No. 13716)
DURHAM JONES & PINEGAR, P.C.
111 East Broadway, Suite 900
Salt Lake City, UT 84111
Telephone: (801) 415-3000
Facsimile: (801) 415-3500
bhamilton@djplaw.com
agregson@djplaw.com

ATTORNEYS FOR DEFENDANTS

IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF UTAH
CENTRAL DIVISION

JOSHUA CHATWIN,
Plaintiff,

v.
DRAPER CITY; OFFICER J. PATTERSON,
in his individual and official capacity;
OFFICER DAVID HARRIS, in his individual
and official capacity; OFFICER HEATHER
BAUGH, in her individual and official
capacity; and JOHN DOES 1-10,

Defendants.

**DEFENDANTS' RULE 26(a)(2) EXPERT
DISCLOSURE**

Civil No. 2:14-cv-00375
Judge Dale A. Kimball
Magistrate Judge Pead

Pursuant to Rule 26(a)(2) of the Federal Rules of Civil Procedure and this Court's docket text Order of March 14, 2016, Defendants' Draper City, Joshua Patterson, David Harris and Heather Baugh, (collectively "Defendants") by and through their undersigned counsel, hereby submit their expert testimony disclosure.

1. Chris W. Lawrence
ELGIN SECURITY CONSULTANTS, INC.
22033 Elmwood Square
St. Thomas, Ontario, N5R 6A1

Mr. Lawrence should be contacted through Defendants' counsel. Mr. Lawrence's signed Expert Report is attached hereto as Exhibit A, which includes his opinions, facts considered, curriculum vitae, history of publications and testimony, and his fee schedule.

There may be other expert witnesses that Defendants may use to support their claims and defenses, which are unknown to Defendants at this time. Defendants reserve the right to identify and disclose any additional expert witness(es) as necessary. Also, to the extent that Plaintiffs' anticipated rebuttal disclosures change Defendants' experts' disclosures in any way, Defendants reserve the right to modify their Rule 26(a)(2) disclosures accordingly, including the remittance of counter reports, as required.

Furthermore, as discovery is ongoing, should Defendants learn additional facts relevant to expert disclosures, these disclosures will be supplemented according to Fed. R. Civ. P. 26(e).

DATED this 14th day of April, 2016.

DURHAM JONES & PINEGAR, P.C.

/s/ R. Blake Hamilton

R. Blake Hamilton
Ashley M. Gregson
ATTORNEYS FOR DEFENDANTS

CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of the forgoing was served this 14th day of April, 2016, via electronic filing, upon the following:

Lisa A. Marcy
CLYDE SNOW & SESSIONS
One Utah Center, Thirteenth Floor
201 South Main Street
Salt Lake City, UT 84111

John K. Johnson
JOHN K. JOHNSON, LLC
10 West 300 South, Suite 800
Salt Lake City, UT 84101

/s/ Sarah Peck